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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF EDWARD J.  
RADETICH, JR. IN SUPPORT OF  
REORGANIZED DEBTORS' TWELFTH  
SECURITIES CLAIMS OMNIBUS  
OBJECTION (UNAUTHORIZED BULK  
CLAIMS)**

**Response Deadline:**

September 15, 2021, 4:00 p.m. (PT)

**Hearing Information If Timely Response Made:**

Date: September 29, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Edward J. Radetich, Jr., pursuant to section 1746 of title 28 of the United States Code, hereby  
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,  
3 information, and belief:

4 1. I am a Managing Director of Kroll Settlement Administration LLC (“KSA”), an affiliate  
5 of Prime Clerk LLC (“Prime Clerk”). KSA’s main office is located in Philadelphia, Pennsylvania.

6 2. I am providing this Declaration in support of the *Reorganized Debtors’ Twelfth Securities*  
7 *Claims Omnibus Objection (Unauthorized Bulk Claims)* (the “**Omnibus Objection**”),<sup>1</sup> filed  
8 contemporaneously herewith in the chapter 11 cases (the “**Chapter 11 Cases**”) of PG&E Corporation  
9 and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the “**Debtors**”  
10 or the “**Reorganized Debtors**,” as applicable).

11 3. I have extensive experience and expertise in all aspects of claims administration,  
12 including direct notice, paper and electronic publication, nominee outreach, website design, claimant  
13 communication, claims intake and processing, distribution of payments, and tax reporting. Notably, I  
14 personally oversaw the very first securities class action, the Atlantic Department Stores class action  
15 lawsuit in 1975. Since then, our team has administered more than 3,000 matters involving securities  
16 fraud, antitrust, consumer, employment and labor, and government enforcement actions. Our team has  
17 handled all aspects of claims administration in many noteworthy securities class action settlements in  
18 recent years, including *In re Bank of America Corporation Securities Litigation*, No. 11-CV-00733-  
19 WHP (S.D.N.Y); *In re Longwei Petroleum Investment Holding Limited Securities Litigation*, No. 13  
20 Civ. 214 (RMB) (S.D.N.Y); and *In re The Bank of New York Mellon ADR FX Litigation*, No. 1:16-cv-  
21 00212 (S.D.N.Y). A detailed description of my experience and qualifications is attached as **Exhibit A**.

22 4. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon  
23 my personal knowledge, the knowledge of other employees working under and alongside me on this  
24 matter, my discussions with the Reorganized Debtors’ personnel and the Reorganized Debtors’ various  
25 advisors and counsel, and my review of relevant documents and information. If called upon to testify, I  
26 would testify competently to the facts set forth in this Declaration. I am authorized to submit this

27  
28 <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Omnibus Objection.

1 Declaration on behalf of the Reorganized Debtors.

2 **Identification of Claims Subject to the Omnibus Objection**

3 5. KSA has been asked by the Reorganized Debtors and their counsel to assist with  
4 reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed in the  
5 Chapter 11 Cases, including identifying claims to be included in the Omnibus Objection. In furtherance  
6 thereof, our team has established and reviewed a database for these claims. The database contains  
7 information extracted from proofs of claim asserting such claims, including, where such details were  
8 included by the claimant, whether a proof of claim was submitted directly by the creditor or by an  
9 attorney or third party on behalf of the creditor.

10 6. Based on our review of the proofs of claim filed in these Chapter 11 cases, we have  
11 identified certain claims submitted on proof of claim forms by third parties (the “**Third Parties**”) on  
12 behalf of PG&E security holders (the “**Security Holders**”). These identified Claims and the Third  
13 Parties who submitted them are set forth on **Exhibit 1** to the Omnibus Objection, which was prepared  
14 by our team under my general supervision, and I am familiar with its contents and the process under  
15 which it was prepared.

16 7. None of the Third Parties provided any documentation with the Rescission and Damage  
17 Proof of Claim Forms or in response to our request to demonstrate authorization to file the Claims on  
18 behalf of the named Security Holders.

19 8. In accordance with the Securities Claims Procedures Order and the Securities Omnibus  
20 Objection Procedures, on May 21, 2021, my team sent a letter by mail and email to the Third Parties at  
21 the mailing and email addresses listed on their respective proofs of claim that specifically requested  
22 evidence that the Third Parties were authorized to act as agents for the Security Holders (the  
23 “**Authorization Request**”). See Order Approving Securities ADR and Related Procedures for  
24 Resolving Subordinated Securities Claims [Docket No. 10015], dated January 25, 2021, ¶8(c), Ex. A-3  
25 ¶ 1.C.3. A template of the authorization request sent to Third Parties is attached as **Exhibit B** hereto.

26 9. The Authorization Requests also specified a return date, which pursuant to the Securities  
27 Claims Objection Procedures was forty-five (45) days from the mailing of the Authorization Requests.

1           10.     The Authorization Requests requested responsive information to be submitted by email,  
2 by mail, or via an online portal created by KSA (the “**Portal**”), and provided details on how to access  
3 the Portal. The Authorization Requests also provided both an email address and a toll-free telephone  
4 number where claimants with questions could reach out to KSA for assistance.

5           11.     The 45-day return date set out in the Authorization Request expired on July 6, 2021.

6           12.     To date, KSA has not received any responses to the Authorization Requests, nor has it  
7 received any of the information requested therein, from any of the Third Parties listed on **Exhibit 1**.

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1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and  
2 correct to the best of my knowledge, information, and belief.

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4 Executed August 18, 2021 in New Jersey.

5  
6 /s/ Edward J. Radetich, Jr.

7 Edward J. Radetich, Jr.

8 Managing Director  
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